

## United States District Court



## Southern District of Texas

|  |  |
|--|--|
| Morgan Gray, LLC<br>versus - - - - -<br>Oxberry General, LLC et al | Case: H- 19-2809   |
|  | Exhibit List   |
| Judge Lynn N. Hughes   | Case Manager: <input checked="" type="checkbox"/> Glenda Hassan<br>Law Clerk: <input type="checkbox"/> DePena <input checked="" type="checkbox"/> Troutman |
| List of:   | Proceeding: Conference   |

| No. | Description                          | Adm | Exd |
|-----|--------------------------------------|-----|-----|
| I   | Slide deck for presentation + binder | ✓   |     |
| 2   |                                      |     |     |
| 3   |                                      |     |     |
| 4   |                                      |     |     |
| 5   |                                      |     |     |
| 6   |                                      |     |     |
| 7   |                                      |     |     |
| 8   |                                      |     |     |
| 9   |                                      |     |     |
| 10  |                                      |     |     |
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| 17  |                                      |     |     |
| 18  |                                      |     |     |
| 19  |                                      |     |     |
| 20  |                                      |     |     |

*Morgans Group LLC*

*v.*

*5104 Caroline LLC, et al.*

# Status Conference Hearing

Cause No. 2020-63081

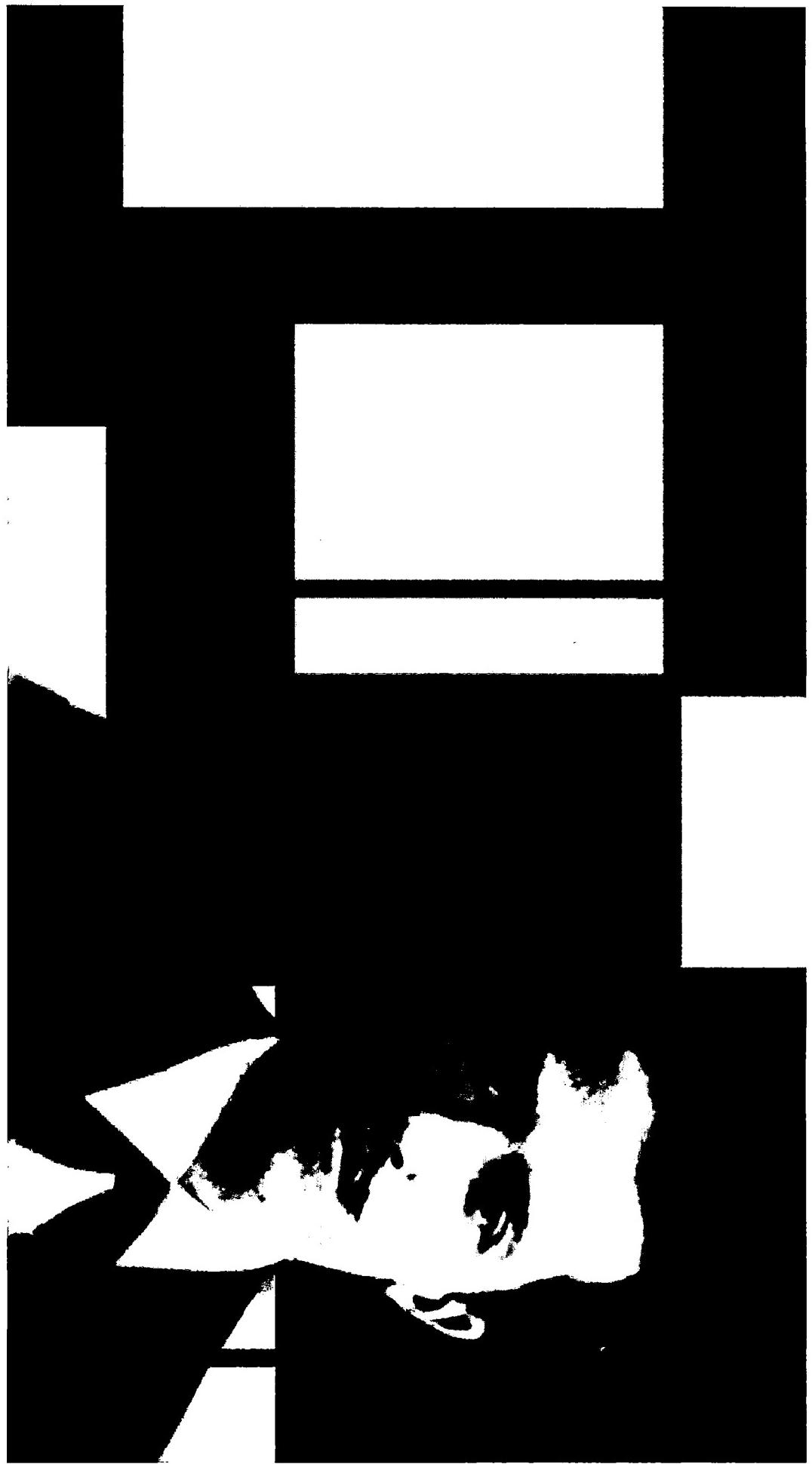
November 23, 2020

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ZAVITSANOS  
ANAPAKOS  
ALAVI  
MENSING

ALA

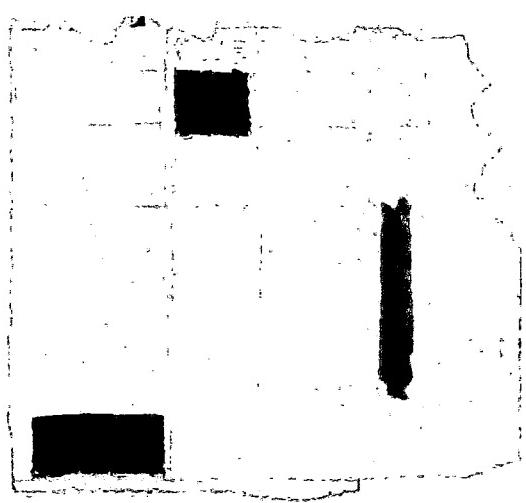
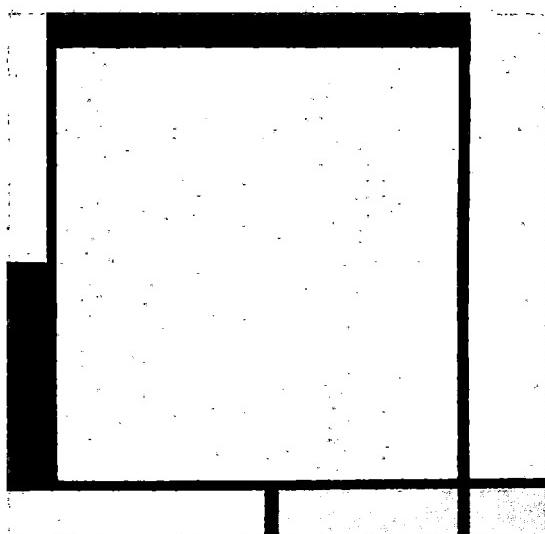
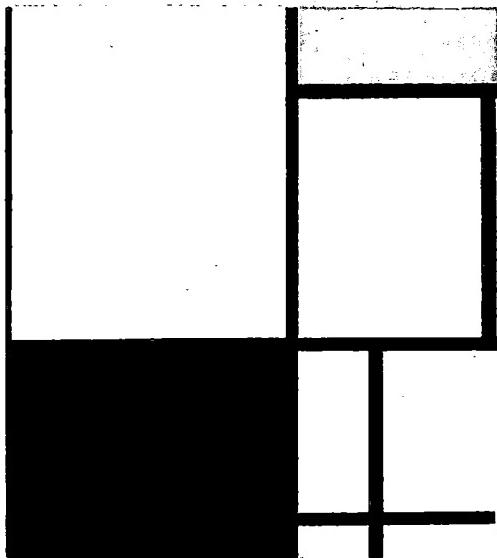
|                        |           |
|------------------------|-----------|
| DEFENDANT'S<br>EXHIBIT |           |
| CASE<br>NO.            | 19 - 2809 |
| EXHIBIT<br>NO.         | 1         |

Piet Mondrian, Dutch, 1878-1944

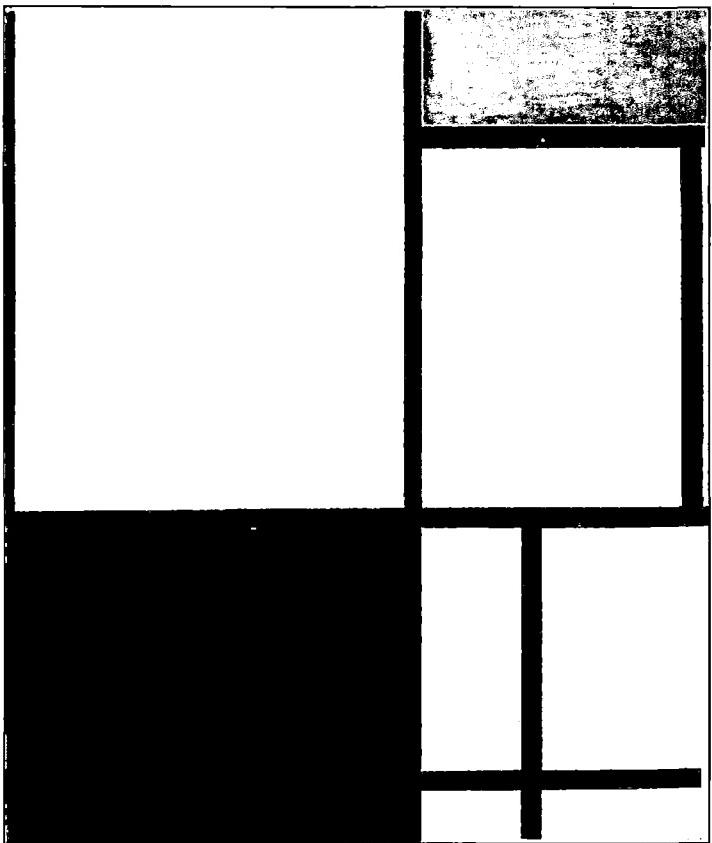


# ASSOCIATION WITH HOUSTON

Three art pieces by Piet Mondrian at Menil Collection,  
Houston, TX



# Mondrian & the Museum District - 1



Piet Mondrian, Dutch, 1872 - 1944  
*Composition with Yellow, Blue, and Blue-White*, 1922  
Menil Collection, Houston, Texas

Source: <https://www.menil.org/collection/objects/4859-composition-with-yellow-blue-and-blue-white>

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# Mondrian & the Museum District - 2



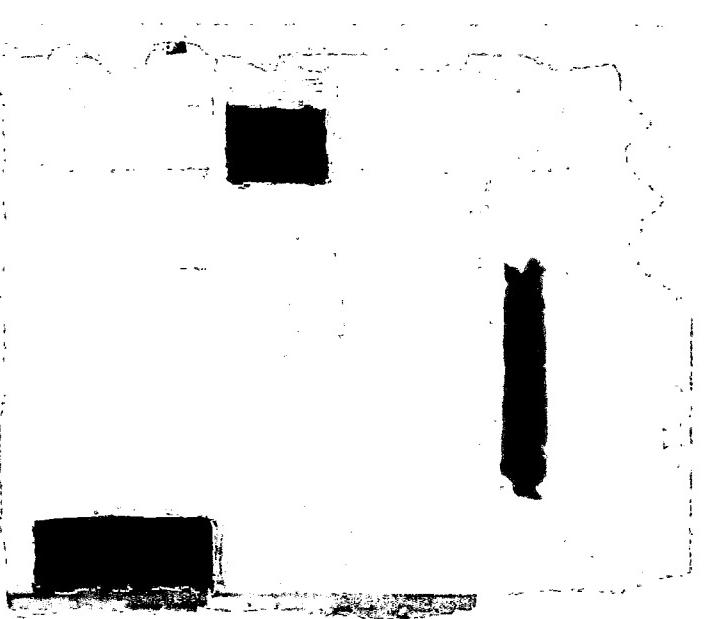
Piet Mondrian, Dutch, 1872 - 1944  
*Composition with Yellow, Red, and Blue*, 1927  
Menil Collection, Houston, TX

Source: <https://www.menil.org/collection/objects/4922-composition-with-yellow-red-and-blue>

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# Mondrian & the Museum District - 3



Piet Mondrian, Dutch, 1872 - 1944  
*Study for a Composition*, ca. 1940-1941  
Menil Collection, Houston, TX

Source: <https://www.menil.org/collection/objects/839-study-for-a-composition>

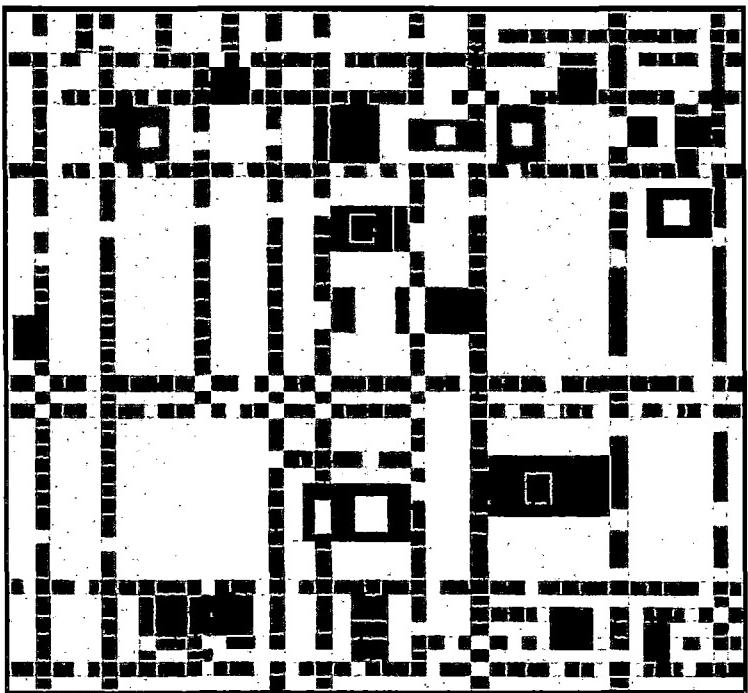
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# Mondrian at MoMA in NYC

26 Mondrian works at the Museum of Modern Art in New York

[https://www.moma.org/collection/works/78682?artist\\_id=4057&page=1&sov\\_referrer=artist](https://www.moma.org/collection/works/78682?artist_id=4057&page=1&sov_referrer=artist)



Piet Mondrian  
*Broadway Boogie Woogie*, ca. 1942-43  
MoMA, New York, NY

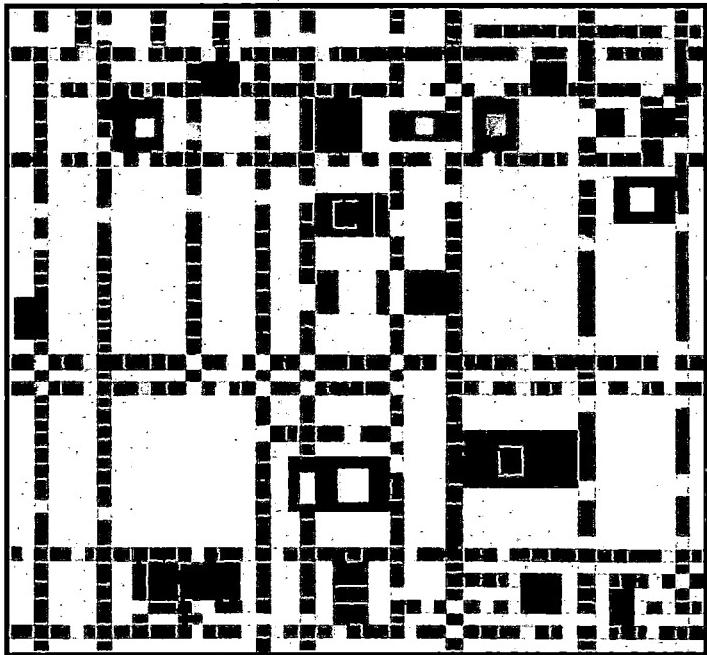
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# Plaintiff Trades on Mondrian's Name

These are the Mondrian logos. Going back to the very name Mondrian, the concept is influenced by the work of Piet Mondrian with his rigorous and powerful grid. In his work *Broadway Boogie Woogie* he famously translated a city into a few lines of yellow and red. This concept translates the silhouette of each Mondrian building into an abstraction of its line with a signature color.

Always use the logo unless using on an area that is too small.



Piet Mondrian  
*Broadway Boogie Woogie*, ca. 1942-43  
MoMA, New York, NY

Source: <https://issuu.com/sbe.events/docs/mondrianglobal-0110brandbook?e=8263872/57501946>

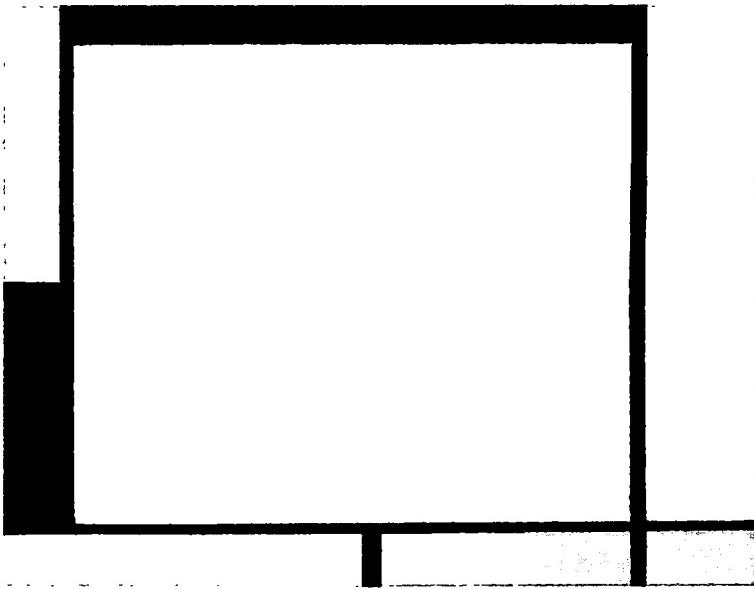
# பெரின்டன் மாண்புவில் உடனடி ரீப்ளேமிலேச் அடிக்காலக் கொண்டுள்ள நிலை

**Plaintiff's Mondrian  
Corporate Logo**

**Piet Mondrian  
Composition with Yellow, Red, and Blue, 1927  
Menil Collection, Houston, Texas**



MONDRIAN



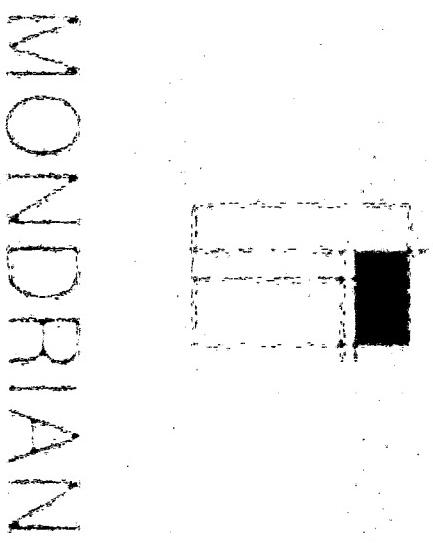
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ZAVITSANOS  
ANJAPAKOS  
ALAVI  
MENSING



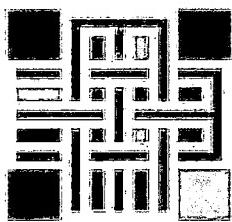
# Defendants' Logo Is Completely Different

Plaintiff's Mondrian  
Corporate Logo

Defendant's Mond at the  
Museums Logo



THE MOND  
AT THE MUSEUMS

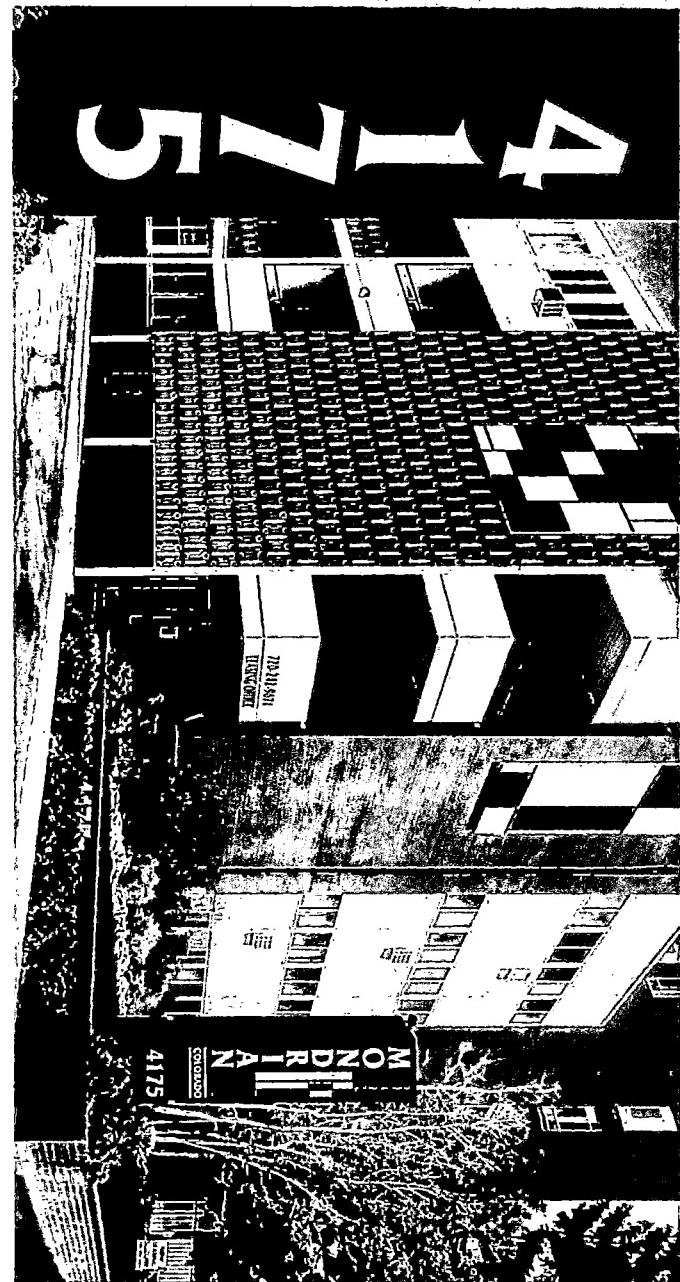


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ZAVITSANOS  
ANAFAKOS  
ALAVI  
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ਪੰਜਾਬ ਵਿੱਚ ਲੋਕਾਂ ਦੀ ਮੁਹੱਲ ਦੇ ਸਮੇਂ

## 1961: Denver



MONDRIAN COLORADO, Denver (est. 1961)

# Plaintiff is Late to the Game

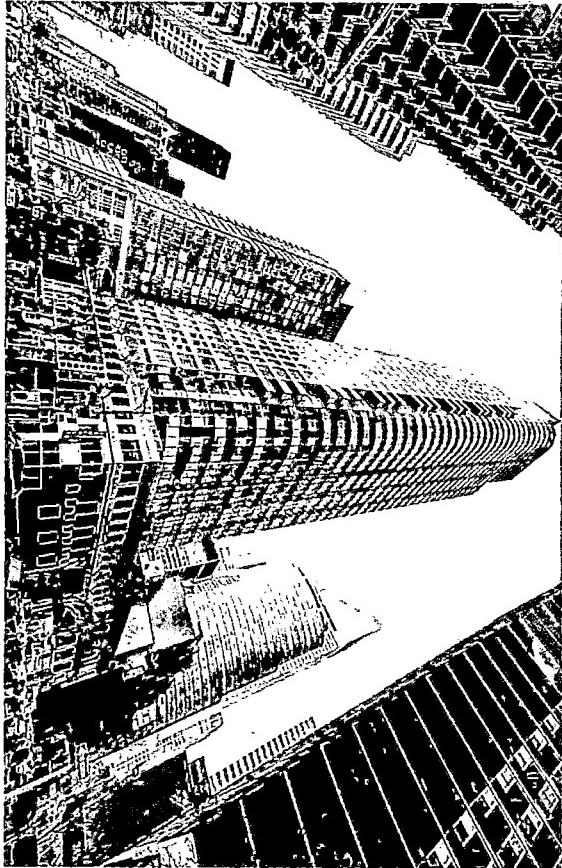
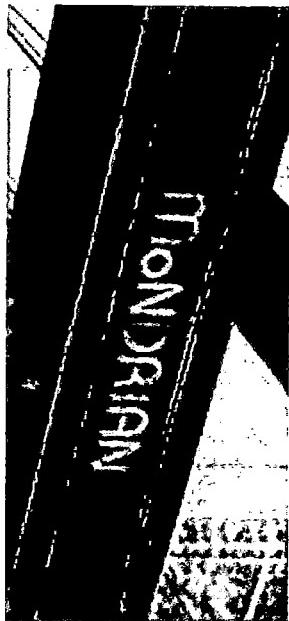
1981: Washington, DC



THE MONDRIAN, (est. 1981)

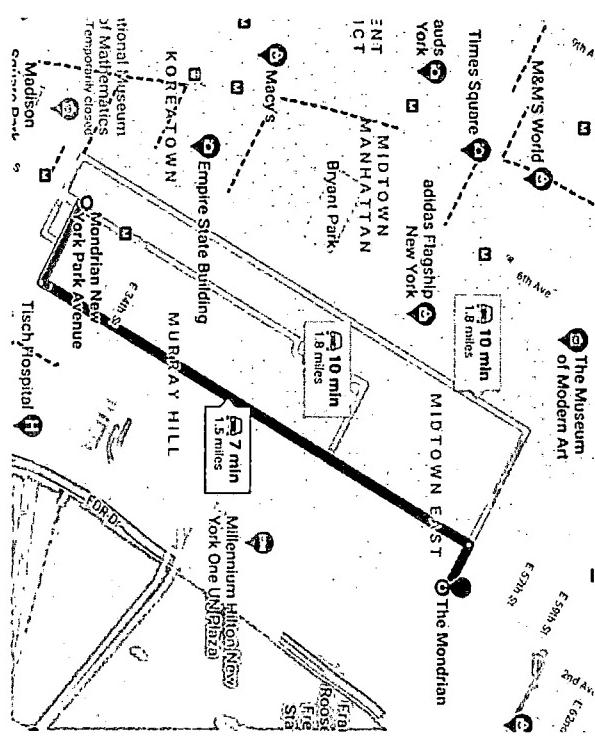
# Plaintiff is Late to the Game

## 1990: THE MONDRIAN in New York City



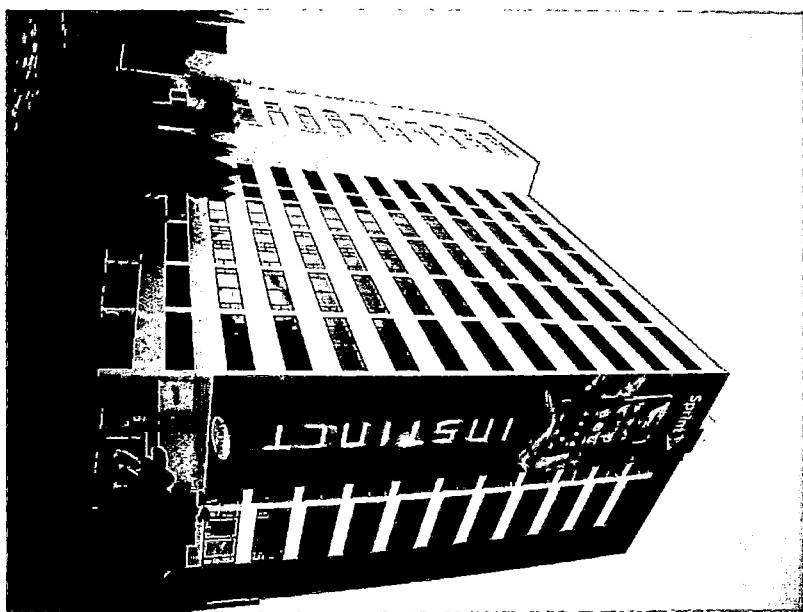
THE MONDRIAN condo building, New York (est. 1990)

Located 7 min away from Plaintiff's  
Mondrian New York park Avenue (est. 2017)



**Plaintiff is Late to the Game**

**1996: Plaintiff's MONDRIAN Los Angeles**



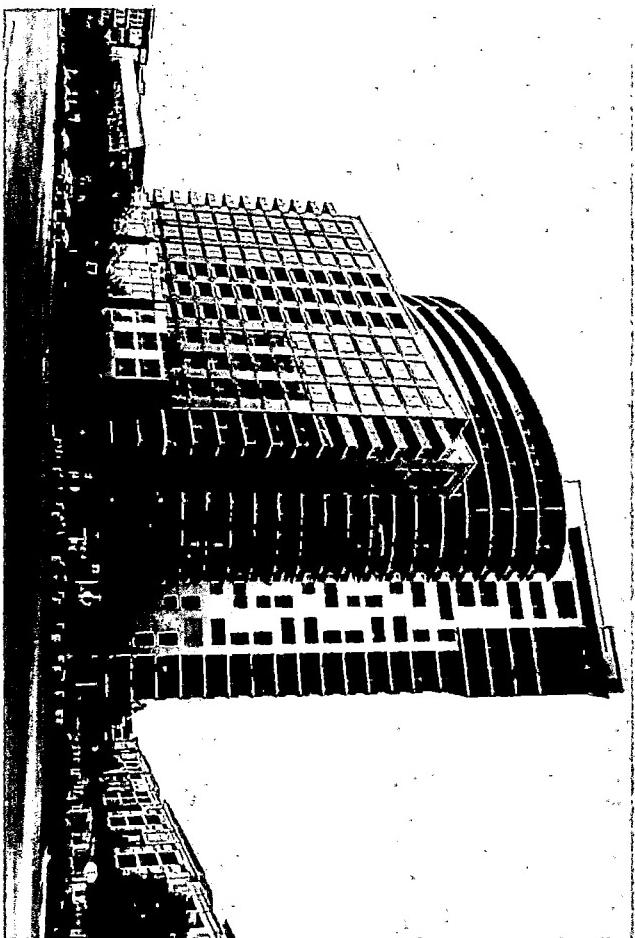
**Mondrian Los Angeles (est. 1996)**

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## 2005: Dallas

3000 BLACKBURN ST. | DALLAS, TX 75204 | 855-246-9755

The Mondrian  
— cityplace —



The Mondrian Cityplace Luxury Apartments (est. 2005)